Exhibit E

Case 3:23-cv-03417-VC   Document 335-5   Filed 12/12/24   Page 2 of 5

11/13/2024   Richard Kadrey, et al. v. Meta Platforms, Inc.   Michael Patrick Clark 30(b)(6), Vol I & Vol II
                                         Highly Confidential

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IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

_____

RICHARD KADREY, et   al.,   )

)

Individual and Representative   )   Lead Case No.

Plaintiffs,   )

)   3:23-cv-03417-VC

    v.   )

)

Meta Platforms, Inc.,   )

)

Defendant.   )

_____)

** H I G H L Y   C O N F I D E N T I A L **

30(b)(6) VIDEOTAPED DEPOSITION OF

META PLATFORMS, INC.

BY: MICHAEL PATRICK CLARK

Denver, Colorado

VOLUMES I AND II

Wednesday, November 13, 2024

Thursday, November 14, 2024

Reported stenographically by:

Michelle Kirkpatrick, RDR-CRR-CRC-CRI, FCRR

_____

DIGITAL EVIDENCE GROUP

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 1                    EXAMINATION

 2    BY MS. POUEYMIROU:

 3         Q     Good evening, Mr. Clark.

 4         A     Good evening.

 5         Q     So you have spent many hours today giving

 6    testimony in your personal capacity.

 7         A     Yes.

 8         Q     Do you understand what that means?

 9         A     I do.

10         Q     And so this evening we'll start as the

11    corporate designee of Meta.

12              What does that mean to you?

13              MS. HARTNETT:  Object to the form.

14         A     It means to me that I'm going to represent

15    responses to a specific set of topics and topics

16    that, unlike my personal recollection, took time to

17    actually prepare and get information to be able to

18    respond on behalf of the company.

19    BY MS. POUEYMIROU:

20         Q     And with respect to the preparation, did

21    you review the deposition notice of the topics that

22    you've been offered for?
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 1        A    I did.

 2        Q    And you guys prepared a binder today of

 3   documents that you reviewed in preparation for these

 4   topics?

 5        A    Yes.

 6        Q    Were these documents that you chose or

 7   that your lawyers chose?

 8        A    Most of the documents were documents that

 9   the lawyers chose.

10        Q    Okay.  And how did you review the -- did

11   you review all of these documents in preparation?

12        A    I did walk through and look at each and

13   every one of the documents and then also spoke to

14   some individuals to get more clarification on

15   questions about some of the topics.

16        Q    And who did you speak with?

17        A    I spoke with Nikolay Bashlykov,

18   Sara Chugh, Lauren Cohen, Brooks Cutter, Angela Fan,

19   Ahuva Goldstand, Nick Grudin, Shaun Lindsay,

20   Steve Satterfield, and Xiaolan Wang.

21        Q    And do you understand the Llama models at

22   issue in this case -- which Llama models are at
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1   STENOGRAPHIC REPORTER'S CERTIFICATE

2   I, Michelle Kirkpatrick, a Registered

3   Diplomate Reporter, Federal Certified Realtime

4   Reporter, do hereby certify that previous to the

5   commencement of the examination, the deponent was duly

6   sworn by me to testify to the truth.
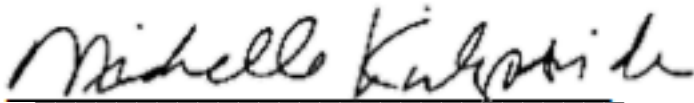
7   I further certify that this deposition

8   was taken in shorthand by me at the time and place

9   herein set forth and was thereafter reduced to

10   typewritten form, and the foregoing constitutes a true

11   and correct transcript.

12   I further certify that I am not related

13   to, employed by, nor of counsel for any of the parties

14   or attorneys herein nor otherwise interested in the

15   outcome of this action.

16   IN WITNESS WHEREOF, I have hereunto set

17   my hand this 18th day of November, 2024.

18

19

20   MICHELLE KIRKPATRICK

                    RDR-CRR-CRC-CRI, FCRR

21   Registered Diplomate Reporter

22   Federal Certified Realtime Reporter